

In the United States District Court for the  
Western District of Virginia  
Charlottesville Division

CLERK'S OFFICE U.S. DIST. COURT  
AT CHARLOTTESVILLE, VA  
FILED

OCT 22 2021

JULIA C. DUDLEY, CLERK  
BY: *[Signature]*  
DEPUTY CLERK

Supplement To Defendant's Objections To  
Plaintiffs' Witnesses.

Comes now the Defendant, Christopher Cantwell,  
and, he adds the following to his prior  
objection to Plaintiffs' Witness List

- 1) As sworn in the attached Declaration,  
Cantwell received a printed email from Plaintiffs'  
Counsel Michael Bloch, from Grady County Jail  
Staff, just after midnight on October 16th
- 2) The email offered to make four witnesses  
available for deposition before trial. Melissa Elliot,  
Larry Sabato, Sean Webster, and Diane D'Costa.
- 3) Bloch sets an October 15th deadline to respond  
to his October 11th email.
- 4) Cantwell tried unsuccessfully to contact Bloch  
about other matters on October 15th before  
getting the printed email.
- 5) Cantwell previously objected to near all of  
Plaintiffs' witnesses as being undisclosed, and  
their depositions improperly noticed.



6) Cartwell is in the middle of being transported for this trial, hence his temporary housing at the Grady County Jail.

7) Cartwell has consequently been stripped of all his legal papers for the third time this year, and is without the benefit of the Plaintiffs' witness list, or his objection to it for reference.

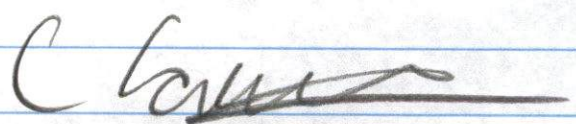
8) US Marshalls will soon transport Cartwell to Virginia with only hours warning, so ~~arranging Depositions~~

9) Arranging last minute depositions under these circumstances is not reasonably possible, and without some reference material Cartwell would have no idea what to ask these witnesses were he to depose them.

10) Cartwell has moved for a continuance, and the Plaintiffs have opposed it.

11) For these reasons, the Plaintiffs' witnesses should be excluded.

Respectfully Submitted  
Chris to pher Cartwell  
10-16-2021





Western District of Virginia

Charlottesville Division

Sines, et al, Plaintiffs, vs.

Kessler, et al, Defendants - Civil Case No 3:17-cv-00072

Sworn Declaration of Christopher Cantwell  
Regarding Plaintiffs' Witness Deposition Availability  
Notice.

I, Christopher Cantwell, do aver on this 16<sup>th</sup>  
Day of October 2021, that the following is true  
and correct, under penalty of perjury,

1) On October 16<sup>th</sup>, just after midnight, Grack  
County Jail Staff delivered to me several  
pieces of legal mail from plaintiffs'  
counsel in this matter.

2) Among them was an email printout from  
Michael Bloch dated October 11<sup>th</sup> 2021, 2:35pm.

3) In the email, Bloch offers to make third party  
witnesses Melissa Elliot, Larry Sabato, Sean Webster,  
and Diana D'Costa available for deposition  
before trial.

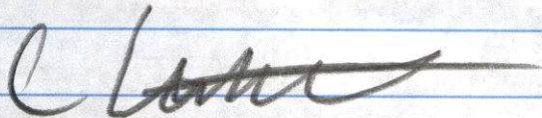
4) Bloch closes by stating the addressee recipients  
should let him know by October 15<sup>th</sup> if  
they seek a deposition with any of the  
listed witnesses.



5) I tried to call Mr. Bloch several times about a separate matter on October 15<sup>th</sup>, and each time the phone rang once, and then promptly disconnected before the acceptance greeting of the Jail's phone system could complete,

Having so averred, I sayeth no more under oath,

Respectfully Submitted,  
Christopher Cantwell 10-16-2021





**From:** Michael Bloch

**Sent:** Monday, October 11, 2021 2:35 PM

**To:** jek318@gmail.com; bryan@bjoneslegal.com; rebrooklaw@gmail.com; David Campbell <dcampbell@dhdgclaw.com>; Richard Spencer <richardbspencer@gmail.com>; richardbspencer@icloud.com; Josh Smith <joshsmith2020@gmail.com>; dillon\_hopper@protonmail.com; eli.f.mosley@gmail.com; deplorabletruth@gmail.com; azzmador@gmail.com

**Subject:** Sines v. Kessler

All,

We agree to make the following third-party witnesses available for a deposition before trial:

- 
- Melissa Elliot
  - Larry Sabato
  - Sean Webster
  - Diane D'Costa

This offer is made without waiver of any rights, arguments or privileges. Please let us know by October 15 if you seek a deposition with any of the above witnesses.

**Michael Bloch | Kaplan Hecker & Fink LLP**

Counsel

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New York, New York 10118

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[mbloch@kaplanhecker.com](mailto:mbloch@kaplanhecker.com)

Mr. Stephen Cantrell #159921184  
c/o Smart Communications - Grady County  
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OKLAHOMA CITY OK 7330

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FOREVER  
USA



Office of the Clerk

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US District Court +  
Western District VA

Charlottesville Division

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